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6 Attorney for Eric Long

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 ERIC LONG,  
15 Defendant.

Case No. 2:21-cr-00229-GMN-BNW  
**STIPULATION TO CONTINUE  
SENTENCING HEARING**  
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.  
17 Frierson, United States Attorney, and K. Nicholas Portz, Special Assistant United  
18 States Attorney, counsel for the United States of America, and Rene L. Valladares,  
19 Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public  
20 Defender, counsel for Eric Long, that the Sentencing Hearing currently scheduled  
21 on August 23, 2022, be vacated and continued to a date and time convenient to the  
22 Court, but no sooner than forty-five (45) days.

23 This Stipulation is entered into for the following reasons:

24 1. As this Court is aware, Mr. Long suffers from a rare and incurable  
25 disease, syringomyelia. His medical condition will be a central feature of the  
26 defense mitigation case at sentencing.

2. All of Mr. Long's doctors are located in Southern California. Because of his extremely limited income, Mr. Long has to save money between doctor visits to afford the cost of travel for his appointments.

3. Mr. Long has been referred for an MRI to assess the current status of his condition and determine his updated treatment needs. He traveled for the MRI two weeks ago. However, he had a panic attack in the MRI machine and the procedure could not be completed. He is currently awaiting an appointment for an MRI to be performed while he is sedated.

4. After the MRI is successfully completed, Mr. Long will need to meet with his neurologist, his pain management doctor, and his primary care physician to discuss the current state of his condition and treatment needs. Defense counsel will then need to speak with these providers and obtain updated records for this Court's consideration.

5. The defendant is out of custody and agrees with the need for the continuance.

6. The parties agree to the continuance.

This is the first request for a continuance of the sentencing hearing.

DATED this 28th day of July, 2022.

RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

*/s/ Joanne L. Diamond*  
By \_\_\_\_\_  
JOANNE L. DIAMOND  
Assistant Federal Public Defender

*/s/ K. Nicholas Portz*  
By \_\_\_\_\_  
K. NICHOLAS PORTZ  
Special Assistant United States  
Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4  
5 Plaintiff,

6 v.

7 ERIC LONG,  
8 Defendant.

Case No. 2:21-cr-00229-GMN-BNW

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the sentencing hearing currently  
11 scheduled for Tuesday, August 23, 2022 at 11:00 a.m., be vacated and continued  
12 to October 4, 2022 at the hour of 11:00 a.m.

13 DATED this 28 day of July, 2022.

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16 UNITED STATES DISTRICT JUDGE  
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